

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEYED MOHSEN HOSSEINI-SEDEHY,

Plaintiff,

v.

ERIN T. WITHINGTON
and CITY OF BOSTON,

Defendants.

Civil Action No. 04-cv-11948-RGS

INITIAL DISCLOSURES OF SEYED MOHSEN HOSSEINI-SEDEHY

A. The following are individuals likely to have discoverable information that Mr. Hosseini-Sedehy may use to support his claims:

- 1.) Seyed Mohsen Hosseini-Sedehy – 106 13th Street, unit no. 120, Charlestown, MA 02129; tel no. (617) 696-1433;
- 2.) Steve Casterline – 18 Pondview Avenue, Scituate, MA 02066;
- 3.) Joseph Bavis – 138 Athens Street, South Boston, MA 02127;
- 4.) Joseph Perry – 212 Beacon Street, Boston, MA;
- 5.) Corey Tang – 125 North Street, Teterboro, NJ, (201) 814-1313;
- 6.) Jon-Jay Associates, Inc. – Peabody, Massachusetts;
- 7.) Patrick Geary – 11 Boutwell Street, Dorchester, MA 02122;
- 8.) TeamsterCare Wellness Office Keeper of the Records – 16 Sever Street, Charlestown, MA;
- 9.) GES Exposition Services, Inc. – Keeper of records - 125 North Street, Teterboro, NJ, (201) 814-1313.

B. The following is a list of the copies of all documents, data compilations, and tangible things, provided to the defendants that Mr. Hosseini-Sedehy may use to support his claims:

Please see the documents, labeled HOS 1 through HOS 310, previously provided in hand on January 18, 2005. Mr. Hosseini-Sedehy is also in possession of the five-page board of probation record of Joseph Bavis. The Internal Affairs Department of the Boston Police Department interviewed Mr. Hosseini-Sedehy. The Boston Police Department is in possession of an audiotape recording of this statement.

C. The following is a computation of the damages claimed by Mr. Hosseini-Sedehy:

- 1.) attorneys' fees – \$43,000
- 2.) mental anguish - \$50,000

Respectfully submitted,
Seyed Mohsen Hosseini-Sedehy
By his attorneys,

/s/ Christopher A. Duggan
Christopher A. Duggan
BBO # 544150
Gerard A. Butler, Jr.
BBO # 557176
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Lincoln North
55 Old Bedford Road
Lincoln, MA 01773-1125
(617) 228-4400

Date: January 19, 2005

CERTIFICATE OF SERVICE

I, Christopher A. Duggan, hereby certify that I have caused a copy of the INITIAL DISCLOSURES OF SEYED MOHSEN HOSSEINI-SEDEHY to be served via first-class mail, postage prepaid, to counsel of record as listed below on January 19, 2005.

Amy E. Ambarik
City of Boston Law Department
Boston City Hall, Room 615
1 City Hall Plaza
Boston, MA 02201

/s/ Christopher A. Duggan
Christopher A. Duggan
BBO No. 544150